



Writer's Direct Dial: 212.388.3025

July 31, 2007

Via Fax (212) 805-0426 and ECF

The Honorable Laura Taylor Swain
U.S. District Court
500 Pearl Street, Rm.
New York, NY 10007

Re: 251 West 36th Street, LLC v. Fishman
07 Civ 5860 (LTS)(AJP)

Dear Judge Swain:

I am writing on behalf of the parties in the above-referenced case to request that the Court grant a further extension of time until August 31, 2007 for Defendant Michael Fishman, President, Local 32BJ, Service Employees International Union ("Local 32BJ") to answer and file an opposition to Plaintiff, 251 West 36th Street, LLC's ("the Employer's") petition to vacate an arbitration award. The parties have made one previous joint request for an extension of time, and prior to that Defendant Local 32BJ made one request for an extension of time. Both prior requests were granted.

The parties make this request because, although they have made progress in the settlement of the underlying dispute, they have not yet been able to reach a settlement. The parties remain optimistic about their ability to settle, and they believe that an additional extension of time will facilitate a settlement of the underlying dispute. The parties further request the extension until August 31st because counsel for both parties are taking vacations in August, and as a result, they believe the entire month may be necessary to conclude a settlement.

For the reasons set forth above, the parties respectfully request that the Court grant Defendant Local 32BJ an extension of time until August 31, 2007 to file an answer and to file papers in opposition to Plaintiff's petition to vacate the arbitration award.

Sincerely,

Andrew L. Strom (AS 2695)
Attorney for Defendant Local 32BJ

cc. Joseph M. Labuda, via fax, (516) 328-0082

SERVICE EMPLOYEES
INTERNATIONAL UNION
CLC

MICHAEL P. FISHMAN
President

KEVIN J. DOYLE
Executive Vice President

HÉCTOR J. FIGUEROA
Secretary-Treasurer

KYLE BRAGG
Vice President

LENORE FRIEDLAENDER
Vice President

BRIAN LAMBERT
Vice President

VALARIE LONG
Vice President

Online at:
www.seiu32bj.org

Local 32BJ Headquarters:
101 Avenue of the Americas
New York, NY 10013-1991
212.388.3800

Office of the General Counsel

SEIU Local 32BJ
101 Avenue of the Americas
19th Floor
New York, NY 10013-1906
Fax: 212.388.2062